EXHIBIT D

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sort of when it started and then take it through the process until it was finished. Like the first step, second step.
A. The product would have an image applied to copper, those areas that were covered by the organic imaging material would remain, those areas that were not covered by the organic materials would be dissolved in the etchant. Subsequently, the product would have the organic material removed and there would be a dielectric put over the top.
Q. How was the dielectric put over the top?
A. The dielectric trim was applied in a heated laminating press.
Q. Was there any waste streams generated from the heated laminating press?
A. Noncontact cooling waters.
Q. Is that the same cooling water we were talking about a couple of hours ago?
A. Yes.
Q. The etching process, would you describe a little more how that actually worked?
A. The pattern was put on an organic material, the etchant material is sprayed on the surface of the copper, the copper surface material is dissolved into solution.

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Q. Now, when the etchant was sprayed on, was that what you described earlier as the fresh etchant?
A. From the sump.
Q. Okay.
A. 15-gallon sump, pumps, a dishwasher.
Q. Where was the product, was it sitting in like a tub or was there some kind of vessel? Where was the spraying happening?
A. Ever been to Burger King?
Q. Yes.
A. Hamburger goes in one end and comes out the other.
Q. Yes. But instead of flame you actually had a spray?
A. Yes.
Q. After it came out the other end, after the spray part of the process where did it go next?
A. It went through a pair of nip rolls.
Q. Nip rolls?
A. Nip rolls and those nip rolls were used to squeegee the solution back into the sump. Subsequently it was hit with an atomized rinse water, out.
Q. Was it like a rinse tank or what kind of

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vehicle held the rinse water?
A. Recirculating rinse tank.
Q. Was there just one tank or more?
A. One.
Q. And that's the rinse tank which you mentioned was eventually -- eventually created the material that you sold to the fertilizer company?
A. No.
Q. Where did that come from?
A. The spent etchant as it became concentrated above a certain level would have to be decanted. That would now contain 28, 30-ounce per gallon of copper. That material would be sold to our friends at Pilgrim or somewhere like that, I forget who it was any more, who made fertilizer out of that stuff.
Q. So then the material in the tank, that recirculating tank, where did that go?
A. Down the drain.
Q. And then was that same material sometimes stored in the various tanks we have discussed?
A. If the sewer company thought that they were being wounded by the amount of copper in the wastewater, that might then go to a tank, tanks.

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Q. Now, besides copper what other, what else was this recycle rinse tank material comprised of?
A. In the time frame that you are discussing there was principally copper as the heavy metal. As you get later in the time frame up until the late seventies, early eighties there was a transition where there might be tin as heavy metal.
Q. Okay. Now, going back to the early-to-mid 1970's, copper, you said, was the principal, what other constituents or chemicals or anything was there besides copper?
A. There probably was some trisodium phosphate which is similar to Spic & Span, and that material, trisodium phosphate, which is, like I said, similar to Spic & Span would have been used to -- the ink was soluble in a caustic material so if you ever used Spic & Span it just takes it right off.
Q. During this early to mid-1970's period did you use any solvents at Flexible Circuits?
A. Yes.
Q. Which solvents?
A. Butyl cellosolve.
Q. Any others?
A. Probably small amounts of acetone.